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AMS GROUP, et al,

Plaintiffs,

Civil Action No.
07-CIV 6988 (LTS)

SAINT CLAIR JACKSON
AFFIDAVIT

VS

JP Morgan Chase, Inc.

Defendants
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I, Saint Clair Jackson, hereby state that the following is true to the best of my knowledge and understanding, except those statements based upon information and belief, which I believe are true. I further understand that all of the statements below are subject to the penalties of perjury. I hereby state the following:

1. I formed AMS Group LLC with partners, with my home as New York Corporate headquarters at 138 Madison Street, Brooklyn, N.Y. 11216.
2. My experience in the fields of energy and finance is extensive.
- 3.. I was comptroller of E.D. & F Man, a world class commodities trading company based in London, England.
4. I performed on supplying fuel oil under contract with the City of New York (see exhibit attached
5. I am a veteran of the United States military..
6. I volunteered to serve my country, to the death, if necessary, to protect and preserve the Constitution and equal rights to free enterprise, which I have been wrongfully denied and which is at the root of this case.
7. Upon Honorable Discharge from the Army, I traveled and lived abroad in Europe

8. I conducted business with high

Ranking officials of the oil ministry for the purchase of crude oil on term contracts, satisfying their due diligence.

9. In 2003- 2004, my financial net worth was approximately one million dollars.

10. Upon my return to the U.S. from abroad, I opened a NGO (non governmental organization) at the United Nations .

11. My extensive and unusual background afforded me superior contacts whereby I learned of the availability of a 100,000 barrel per day sweet crude oil refinery. There is no comparison to the value of such a facility in that the asking price ranged from \$100,000,000 initially, down to \$60,000,000 to \$65,000,000.00, ultimately.

The national debate on environmental issues surrounding oil refineries operating in the US was the main reason of the devalued price and open the opportunity to purchase the refining assets.

It is impossible to build such a refinery today, for less than two billion dollars, as a low estimate, including as it must all licenses, permits necessary to achieve compliance with EPA standards as set forth in the Clean Air Act. All of these elements were in Place with the refinery I had been offered through extremely knowledgeable contacts in the industry..

12. The defendants misconduct in the processing of our application has caused us To lose out on a once in a lifetime opportunity to contribute as African Americans in the energy sector where we are virtually nonexistent as producers of energy. At a time when every other word in the media is “energy” and the pinnacle of profitability in energy production and supply is upon us, we, as Minorities are forced to stand on the sidelines as observers and consumers, yet again. Our

13. I was certain that the deal for the refinery would succeed since we had every conceivable element required for success and in the process, mistakenly relying upon a reasonable expectation of fairness and equal treatment, I made other business decisions which, together with the bank's misconduct, have contributed to my financial undoing to the extent that my house has been scheduled for auction by another bank.
14. While it is my home, where my mother who is nearly ninety years of age, lives with me, along with my daughter, my house is also the original New York headquarters of AMS Group LLC..
15. I therefore plead with the court for justice and relief before it is too late, given the facts, by finding in our favor in the Summary Judgment or at least allowing the Case to go forward.
- 16 Finally, I ask the court to accept this Affidavit also as a Motion to Stay the mortgage Company from auction pending the outcome of this case to give me a fighting chance to adjust to the onerous demands of the Adjusted Rate Mortgage that now threatens me and my family with homelessness. I need time to accomplish a workout with the bank holding the mortgage.

Dated: June 30, 2008

_____/s/_____

Saint Clair Jackson

Notary Public

